

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

F. E. Wheaton and Company  
Attn: Jeff Brown  
204 West Wheaton Drive  
Yorkville, Illinois 60560

Application No.: 97010015  
Applicant's Designation: FLOWCOAT  
Subject: Flowcoaters  
Date Issued:  
Location: 204 West Wheaton Drive, Yorkville

I.D. No.: 093801AAM  
Date Received: March 7, 2005  
Expiration Date:

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of five flowcoaters and one drying oven pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for any single hazardous air pollutant (HAP), and 25 tons/year for all HAPs combined). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions of VOM and operation of the five flowcoaters and one drying oven shall not exceed the following limits:

VOM Usage		VOM Emissions	
(Tons/Mo)	(Tons/Yr)	(Tons/Mo)	(Tons/Yr)
11.0	95.0	11.0	95.0

These limits define the potential emissions of VOM and are based on maximum coating, solvent, and additive usages, maximum VOM content, and limits as requested by the company. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

3. Pursuant to 35 Ill. Adm. Code 215.204(1), the types of coatings applied in the five flow coaters shall not exceed the following lb VOM/gallon of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator:

<u>Coating</u>	<u>VOM Content (Lb VOM/Gal)</u>
Opaque Stain	4.7
Non-Topcoat Pigmented Coat	5.0
Semi-Transparent Stain	6.6
Sealer	5.6

4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
5. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
6. The Permittee shall maintain monthly records of the following items:
  - a. Amount of each coating, solvent, and additive used on all flow coaters (tons/month and tons/year);
  - b. VOM and HAP content of each coating, solvent, and additive used on all flow coaters (lb VOM/gallon or weight percent);
  - c. VOM emissions with supporting calculations. The following equations shall be used to calculate VOM emissions:

$$Te = \sum_{i=1}^n A_i B_i$$

Where:

Te = Total VOM emissions from all coating lines each month in units of lbs/month or tons/month;

n = Number of different coatings, solvent, and additive as applied each month on all coating lines;

i = Subscript denoting an individual coating, solvent, and additive;

A<sub>i</sub> = Weight of VOM per volume of each coating, solvent, and additive as applied each month on all coating lines in units of lbs VOM/gallon; and

$B_i$  = Volume of each coating, solvent and additive as applied  
each month on all coating lines in units of gallons/month.

- d. Emissions of each individual HAP with supporting calculations.
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:GMK:psj

cc: Region 1

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the Coating Facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, (e.g., 100 tons per year of VOM) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

Process	E M I S S I O N S		
	HAP		HAPs
	VOM (Tons/Yr)	Single (Tons/Yr)	Combined (Tons/Yr)
5 Flow Coaters and One Drying Oven	95.0		
Totals:	95.0	< 10	< 25

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## PROJECT SUMMARY

### I. INTRODUCTION

F. E. Wheaton Lumber Company has voluntarily applied for an operating permit for its Yorkville coated wood furniture manufacturing facility in order to voluntarily incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by recordkeeping and reporting requirements to assure that the facility is operated as a non-major source.

### II. SOURCE DESCRIPTION

F. E. Wheaton Company manufactures shutters, railings, wood trim, siding, and coated lumber. The company operates three flow coaters. Uncoated wood boards are passed through coaters and then placed on racks to air dry.

### III. EMISSIONS

The principal air contaminant emitted from the facility is volatile organic material (VOM) which is generated during solvent handling/usage from the coating lines. Flow coaters are used to apply coating to wood. The coated parts are air dried. VOM emissions are estimated as all organic material contained in the coatings, additives, and clean up solvents. VOM emissions are vented outside the building.

### IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards at 35 Ill. Adm. Code, Subtitle B. The coating lines are required to meet the requirements of 35 Ill. Adm. Code 215.204(1). The Board has standards for sources of volatile organic material emissions. This site readily complies with all applicable Board standards.

### V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on usage of raw materials. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are required on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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